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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**PG&E'S FURTHER SUBMISSION IN
ADVANCE OF MARCH 23, 2021
HEARING**

Judge: Hon. William Alsup

1 Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this
2 further submission in advance of the March 23, 2021 hearing.

3 *First*, in response to the Court’s request for the communications between PG&E
4 and the CPUC referenced in the CPUC’s March 19, 2021 letter, PG&E is producing as Exhibit A
5 the written correspondence that it believes the CPUC’s letter may have been referring to. (*See*
6 Dkts. 1349, 1355.) PG&E has not included scheduling emails and calendar invitations as it does
7 not understand those to be responsive to the Court’s request.

8 *Second*, for the Court’s awareness, PG&E is producing as Exhibit B a copy of a
9 news release issued by CAL FIRE this evening regarding the Zogg Fire. In the press release,
10 CAL FIRE states among other things that it has determined that the Zogg Fire was caused by a
11 pine tree contacting electrical facilities owned and operated by PG&E located north of the
12 community of Igo.

13 *Third*, as part of PG&E’s March 12, 2021 submission, PG&E provided the Court
14 with certain documents relating to post-wildfire response work as Exhibits J-1 to J-10.
15 (Dkt. 1337 at 9; Dkt. 1337-10.) PG&E is supplementing that production by producing as
16 Exhibits J-11 to J-17 various iterations of a document titled “Carr Fire Second Patrol” that were
17 emailed between contractors working on the post-Carr Fire response in late August and early
18 September 2018.¹

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26 ¹ PG&E is producing Exhibits J-11 to J-17 in the order in which the cover emails indicate
27 that they were sent. The cover emails identify Exhibit J-12 as “1st draft”, Exhibit J-13 as
28 “2nd draft”, Exhibit J-14 as “3rd draft” and Exhibit J-15 as “4th draft”. PG&E can produce the
cover emails upon request.

1 Dated: March 22, 2021

Respectfully Submitted,

2 JENNER & BLOCK LLP

3
4 By: /s/ Reid J. Schar
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5 CRAVATH, SWAINE & MOORE LLP

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7 By: /s/ Kevin J. Orsini
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